

A-G79 @B9CI G'H9LH'fl 97 : cfa ' - - L

PAGE 1 / 1

Federal Election Commission
 Attention: Nicole Miller
 Campaign Finance Analyst
 Reports Analysis Division
 999 E Street, NW
 Washington, DC 20463

Re: National Association of Broadcasters Political Action Committee (NABPAC) (C00009985)

Dear Ms. Miller:

NABPAC is in receipt of your Request for Additional Information dated May 21, 2012 regarding the March Monthly report (2/1/2012 - 2/29/2012) filed by NABPAC. This letter provides a comprehensive response to your inquiry concerning earmarked contributions with dates that appear outside the permissible time period. A review of the record indicates that the transactions were incorrectly dated due to a data entry error by assisting staff during a staff transition.

Specifically, of the 17 earmarked disbursements reported on the March Monthly report, 6 disbursements were previously reported as disbursed outside the ten (10) day window set by Federal regulations in relation to the reported date of receipt for contributions from two NABPAC contributors, Patricia Smullin and Jonathan Burdick.

It is and has always been the practice of NABPAC to forward earmarked funds within the allotted time under the regulations. After reviewing the backup records related to the disbursements and receipts, it appears the dates that were previously reported were incorrectly entered into the database that NABPAC uses to generate its FEC reports. Our records indicate that:

- Receipts from Ms. Smullin were received and processed on Feb 26 (rather than Feb 13 the date on the check from Ms. Smullin); per the instructions from Ms. Smullin, the 4 expenditures were earmarked and disbursed on Feb 27 2012 as previously reported; and,
- Receipt from Mr. Burdick was received and processed on Feb 2 2012; per instructions from Mr. Burdick, 2 expenditures were earmarked and disbursed on Feb 9 2012 rather than Feb 13 as previously reported.

Contemporaneously, with this response to your letter of May 21 2012, NABPAC has filed an amended March Monthly report to correct clerical data entry errors for the dates and report that NABPAC forwarded the earmarked funds within the timeframe set by the regulations.

NABPAC has conducted an internal review of this error to ensure that reporting of earmarked funds is precisely reported in the future. Further, NABPAC has hired and trained additional staff, and the policies and procedures regarding earmarked funds have been updated to ensure that data entry accurately reflects the record.

It is our expectation that this response provide you with all the necessary information in response to your inquiry. Of course, should have any questions or need additional information, please do not hesitate to contact me.

Sincerely,
 Laura Winters
 Assistant Treasurer
 National Association of
 Broadcasters Political Action Committee
 (202) 429-5427